



RECEIVED and FILED by the  
NEW JERSEY STATE BOARD OF  
VETERINARY MEDICAL EXAMINERS

on this date of: 12-17-15 DA

CHRIS CHRISTIE  
Governor

KIM GUADAGNO  
Lt. Governor

State of New Jersey  
OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF LAW AND PUBLIC SAFETY  
DIVISION OF LAW  
PO Box 45029  
Newark, NJ 07101

JOHN J. HOFFMAN  
Acting Attorney  
General  
MICHELLE MILLER  
Acting Director

December 10, 2015

Via Email and Regular Mail  
Abdul R. Kazam, D.V.M.  
1542 Mosswood Drive  
Vineland, New Jersey 08630

Re: IMO Abdul R. Kazam, D.V.M.

Dear Dr. Kazam:

I am a Deputy Attorney General assigned to counsel the New Jersey State Board of Veterinary Medical Examiners ("Board"). This letter is to advise you that the Board completed its review of information concerning the inspection of your facility located at 1542 Mosswood Drive, Vineland, New Jersey on October 15, 2014.

The facility had been observed to be cluttered, unsanitary and unkempt; and had a strong foul odor. The carpeting on the steps to the facility was heavily soiled. Additionally, several Controlled Dangerous Substances (CDS) and Prescription Legend Drugs (PLD) were present on the premises, co-mingling with non-expired medications.

Based upon its review of the information available, the Board has determined that you have engaged in the following actions which constitute violations of the Board's statutes and regulations:

1. Failure to maintain the veterinary facility in a clean and sanitary manner at all times in violation of N.J.S.A. 45:16-8.2; and
2. Failure to secure CDS in violation of N.J.S.A. 24:21-11(1) and failure to dispose expired CDS in accordance with N.J.A.C. 13:45H-8.10.

These failures constitute acts sufficient to initiate the filing of formal disciplinary proceedings. However, the Board



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has determined that it will first offer you an opportunity to settle this matter, and avoid the initiation of formal disciplinary proceedings, should you agree to the following:

1. Pay a civil penalty of \$2,000.00 for failure to maintain the premises in a clean and sanitary manner at all times in violation of N.J.S.A. 45:16-8.2;
2. Pay a civil penalty of \$1,000.00 for failure to secure CDS in violation of N.J.S.A. 24:21-11(1) and failure to dispose expired CDS in accordance with N.J.A.C. 13:45H-8.10; and
3. Agree to close the practice for a minimum of 60 days in order to remediate the unsanitary conditions and to remain closed until such time as you can demonstrate to the Board's satisfaction that the premises are clean and sanitary.

Please be advised that the terms of this settlement offer are proposed for settlement purposes only and the Board will not be bound by its terms in the event you do not accept it. Please note you have the right to retain counsel and have him or her review the proposed settlement. If you retain counsel, please have your attorney call me as soon as possible.

If you are willing to settle this matter on the offered settlement terms, you may do so by signing the attached acknowledgment letter, and returning it to the Board office. Once the acknowledgement is signed by the Board President and filed, a copy will be mailed to you for your record. The penalty may be paid by a check or money order made payable to the "State of New Jersey - Board of Veterinary Medicine" and should be submitted to the Board office. You should be advised that upon receipt of your signed acknowledgment, this letter will be a matter of public record.

In the event you are unwilling to settle this matter on the offered terms, it will be referred to the Attorney General's office for the initiation of an appropriate enforcement action. In such event, you will be afforded an opportunity to defend against the alleged violations. If an evidentiary hearing is deemed warranted, the Board will either conduct that hearing at a date and time to be scheduled or refer the matter to the Office of Administrative Law. You are advised, however, that in the event formal charges are filed, the Board may assess civil penalties in an amount greater than those offered in settlement here, in addition to other sanctions, should any charges against

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you be sustained. Additionally, the Board may, if the facts are found to so warrant, enter an order requiring you to reimburse certain monies and/or requiring you to pay the additional costs incurred by the Board. Should you have any questions concerning this letter or the settlement offer, please contact me at (973) 648-7457.

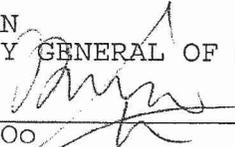
If you elect to settle this matter, you should sign the acknowledgment at the bottom of this letter and return it to the Board within fifteen (15) days following your receipt of this letter. In the event that the Board receives no response from you within fifteen (15) days, the Board's settlement offer will be withdrawn, and the matter will be referred to the Attorney General's Office for the initiation of appropriate enforcement proceedings.

Thank you for your consideration and prompt attention to this matter.

Sincerely,

JOHN J. HOFFMAN  
ACTING ATTORNEY GENERAL OF NEW JERSEY

By:

  
Swang S. Oo  
Deputy Attorney General

Encl. .

Cc. Jonathan Eisenmenger  
Executive Director of the Board

**ACKNOWLEDGMENT:** I, Abdul R. Kazam, D.V.M., have read and reviewed the settlement proposal set forth in this settlement letter. I acknowledge the conduct which has been charged. I am aware that by signing this acknowledgment, I am waiving any rights I may have to defend myself against any charges of wrongdoing at an administrative hearing. I am also aware that the action taken against me by the Board is a matter of public record, and that this letter is a public document. I agree to comply with the directives noted. I will:

1. Pay a civil penalty of \$2,000.00 for failure to maintain the veterinary facility in a clean and sanitary manner at all times in violation of N.J.S.A. 45:16-8.2;
2. Pay a civil penalty of \$1,000.00 for failure to secure CDS in violation of N.J.S.A. 24:21-11(1) and failure to dispose expired CDS in accordance with N.J.A.C. 13:45H-8.10;
3. Agree to close the practice permanently;
4. Agree that the first \$1,000 is due and payable immediately, and the additional \$2,000 penalty stayed and held in abeyance for five (5) years to ensure compliance that my facility remains closed. If I am found to have opened the facility, the \$2,000 will become due immediately and costs for investigation and prosecution will be added.

12-11-2015

Date



Abdul R. Kazam, D.V.M.